

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	
)	
v.)	No. 1:21-cr-10256-IT
)	
KINGSLEY R. CHIN,)	
)	
Defendant.)	

**GOVERNMENT’S MOTION TO SEAL ITS FORTHCOMING MOTION *IN LIMINE* TO
PRECLUDE CROSS-EXAMINATION OF GOVERNMENT WITNESSES
REGARDING CRIMINAL OFFENSES**

The government respectfully requests leave to file under seal Exhibits A through C of its forthcoming Motion *in Limine* to Preclude Cross-Examination of Government Witnesses Regarding Criminal Offenses.

These exhibits consist of the criminal records of three individuals that the government anticipates calling at the upcoming trial. To protect these witnesses from embarrassment and to prevent these records from becoming a part of the public record, the government respectfully requests leave to file these exhibits under seal.

Pursuant to Local Rule 7.1, the government has conferred with counsel for Kingsley Chin regarding the relief requested in this motion. Chin does not oppose the motion to seal, but reserves the right to seek to unseal these materials at a later date.

Dated: April 11, 2025

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

LEAH B. FOLEY
United States Attorney

/s/ Chris Looney
MACKENZIE QUEENIN
ABRAHAM R. GEORGE
CHRISTOPHER LOONEY
Assistant U.S. Attorneys
1 Courthouse Way
John Joseph Moakley U.S. Courthouse
Boston, MA 02210
(617) 748-3100

CERTIFICATE OF SERVICE

The undersigned hereby certifies that I caused this document to be filed through the ECF system on April 11, 2025.

/s/ Chris Looney
CHRISTOPHER LOONEY